



DEPARTMENT OF THE NAVY
BASE REALIGNMENT AND CLOSURE
PROGRAM MANAGEMENT OFFICE, NORTHEAST
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5900
PMO NE/DK
Ser 07-072
May 16, 2007

Ms. Mary Sanderson, Chief
Remediation and Restoration II Branch
United States Environmental Protection Agency
New England – Region 1
1 Congress Street, Suite 1100 (HBT)
Boston, MA 02114-2023

Ms. Claudia Sait
Maine Department of Environmental Protection
Bureau of Remediation and Waste Management
State House, Station 17
Augusta, ME 04333-0017

Dear Ms. Sanderson and Ms. Sait:

**SUBJECT: COMMUNITY ENVIRONMENTAL RESPONSE FACILITATION ACT
(CERFA) IDENTIFICATION OF UNCONTAMINATED PROPERTY AT
NAVAL AIR STATION, BRUNSWICK (NASB), MAINE**

This letter is in response to the comments, questions and concerns outlined in your letters of March 1, 2007 and January 30, 2007, respectively, from the review of the draft "CERFA Identification of Uncontaminated Property at the Naval Air Station Brunswick, Maine", dated December 2006.

As stated in my letter of April 3, 2007, the Navy accepts the decision of the United States Environmental Protection Agency (EPA) and Maine Department of Environmental Protection (MEDEP) not to concur with the proposed categorization of select areas of the NAS as CERFA uncontaminated property at this time due to the data gaps and questions raised in your letters. Many of these data gaps will be filled and questions answered by the ongoing environmental investigation and cleanup work being conducted at NAS Brunswick under the Navy Installation Restoration Program (IRP). Additional research and investigation will be performed during a follow-up phase addressing issues and potential new sites identified as a result of the CERFA process.

To ensure that all data gaps and concerns are addressed, including those identified through regulatory review comments on Navy documents, calls/tips from the general public, Restoration Advisory Board meetings, anecdotal evidence, interviews, etc., the Navy intends to develop a tracking system and use a standard decision-making process for determining the follow-up actions necessary. All such "outstanding issues" will be addressed under the appropriate Navy environmental program. This will ensure that all issues are given proper attention and a record of issue resolution is included in the Administrative Record.

Information generated through this tracking and follow-up system will be compiled and presented as supporting documentation for Findings of Suitability to Transfer (FOSTs) and other property transfer documents.

Your comments are appreciated, and will be incorporated into the aforementioned environmental issue tracking system (ITS) and follow-up process as the Navy moves toward closure and disposal of NAS Brunswick property.

Responses to EPA and MEDEP comments follow:

RESPONSES TO EPA COMMENTS

I. Base Wide Groundwater / Institutional Controls

Plume boundaries, buffer zones and groundwater flow directions will be better defined upon completion of the ongoing and/or planned IRP site investigations and groundwater modeling. The Navy intends to review with USEPA and MEDEP (the Regulators) each Record of Decision (ROD) for NAS Brunswick in light of the BRAC 2005 decision to close and transfer property outside of the Federal Government. RODs and institutional controls boundaries will then be modified, as deemed necessary based on these reviews.

II. Legal Description of Parcel

The Navy is currently arranging for a boundary survey of the NAS Brunswick Main Base and each remote property. Legal descriptions and surveys will be provided for transfer parcels as they are identified in the future.

III. Pesticides

Historic pesticide application practices will be incorporated into the ITS, and research will be performed to determine the proper follow-up action(s).

IV. Adjacent Parcels

A Site 12 groundwater investigation is planned under the IRP. This investigation will assist in determining the potential for contaminated groundwater (if identified) to impact Areas A-3 or A-4. Also, the potential for groundwater contamination in the former Brunswick Gardens housing area (Area A-2) will be incorporated into the ITS, and research will be performed to determine the proper follow-up action(s).

V. Asbestos

The report did not reference an asbestos survey because the proposed CERFA uncontaminated areas did not include buildings (other than the recently constructed housing in Area A-2 and the Golf Course Clubhouse). Much of the information on

the existence, extent and condition of asbestos-containing materials at NAS Brunswick was included in the May 30, 2006 *Environmental Condition of Property Report, Revision 2* (ECP). Additional information collection and compilation will be needed to support the applicable FOSTs as parcels are identified for transfer. This item will be incorporated into the ITS for appropriate follow-up action.

RESPONSES TO MEDEP COMMENTS

General Comments:

1. Plume boundaries and groundwater flow directions will be better defined upon completion of the ongoing and/or planned IRP site investigations and groundwater modeling. The Navy intends to review with the Regulators each NAS Brunswick ROD in light of the BRAC 2005 decision to close and transfer property outside of the Federal Government.
 - a.) The potential for groundwater contamination in the former Brunswick Gardens housing area will be incorporated into the ITS, and research will be performed to determine the proper follow-up action(s).
 - b.) A Site 12 groundwater investigation is planned under the IRP.
 - c.) A Site 12 groundwater investigation is planned under the IRP; the abandoned underground pipeline and herbicide/pesticide practices associated with the Golf Course will be incorporated into the ITS, and research will be performed to determine the proper follow-up action(s).
 - d.) The legend for the 1946 base map indicates these structures were all houses or sheds, except for one line shack. A "D" size or larger hard copy of the map will be provided to the Regulators by the NAS Brunswick Environmental Department. The issue of aircraft exhaust fallout will be incorporated into the ITS, and research will be performed to determine the proper follow-up action(s).
2. Noted. The discussion of statutory authority was intentionally limited to explaining the requirements for identification of uncontaminated property under CERFA. The section will be modified to state that concurrence for the non-NPL remote properties must be obtained from the "appropriate State official."
3. Fuel drop sites will be incorporated into the ITS, and research will be performed to determine the proper follow-up action(s).
4. Past airplane crashes at the NAS will be incorporated into the ITS, and research will be performed to determine the proper follow-up action(s).
5. The issue of aircraft exhaust fallout will be incorporated into the ITS, and research will be performed to determine the proper follow-up action(s).

6. The issue of non-liquid PCBs in products will be incorporated into the ITS, and research will be performed to determine the proper follow-up action(s).
7. Identification and possible sampling of areas that formerly had PCB-containing equipment will be incorporated into the ITS, and research will be performed to determine the proper follow-up action(s).
8. Land farming of petroleum-contaminated soil will be incorporated into the ITS, and research will be performed to determine the proper follow-up action(s).

Specific Comments:

9. Questions and concerns included in MEDEP comments on the ECP Report will be reviewed to determine which should be included in the ITS.
10. The leakage referred to is leakage to the exterior of the building (i.e., to the environment). If there is no pathway (e.g., significant floor cracks or holes in wall seams) for liquids to exit the boiler or mechanical room, then the room is Category 1. Should this table be used in the future to evaluate buildings at NAS Brunswick, it will have the words "to the environment" added after "leakage" to clarify.
11. The transformer area at the Golf Course Pump House will be incorporated into the ITS, and research will be performed to determine the proper follow-up action(s).
12. The legend for the 1946 base map indicates these structures were all houses or sheds, except for one line shack. A "D" size or larger hard copy of the map will be provided to the Regulators by the NAS Brunswick Environmental Department.
13. Because there is no concurrence on the proposed uncontaminated property, the Navy does not plan to produce a revision to this document other than changed pages for error corrections, which will result in a final CERFA report. The issue of impacts or potential impacts to the A-2 New Housing Area from the Mobile Home Park will be incorporated into the ITS, and research will be performed to determine the proper follow-up action(s).
14. See response to Comment 12.
15. Because there is no concurrence on the proposed uncontaminated property, the Navy does not plan to produce a revision to this document other than changed pages for error corrections, which will result in a final CERFA report.
 - a.) Coal stored at NASB was burnt in the heating plant and locomotives on the base. There is no evidence of any coal gasification plant at NASB, but we will add this item to the ITS for verification.
 - b.) The Air Force transmitter, receiver and communications compound was transferred to the Navy and is currently the location of Building 87, the

Tactical Support Center (TSC), formerly the Anti Submarine Warfare Operations Center (ASWOC). The Navy's use of the compound is similar to the Air Force's use, being an operational function. A remnant of the former Air Force compound is Building 594, behind the TSC. Building 594 (TSC tower) is used primarily to support mounted antennas.

16. The requested text regarding removal of PCB-contaminated soil will be added and a new page provided.
17. The Area A-2 label was inadvertently moved. A new Figure 3 will be provided.
18. A "D" size or larger hard copy of the 1946 map will be provided by NASB at the next technical meeting in June.
19. Noted. The text referred to is a PDF copy of a page from the Housing Environmental Baseline Survey for Transfer (EBST). Thus, it cannot be edited.
20. Noted. The text referred to is a PDF copy of a page from the Housing EBST. Thus, it cannot be edited. Also, see response to Comment 7 regarding PCB transformers.
21. See response to Comment 11 regarding Golf Course Pump House transformer area.
22. Appendix E, Adjacent Properties Observations Tables, Main Base: Groundwater flow directions will be better defined for future documents upon completion of the ongoing and/or planned IRP site investigations and groundwater modeling.
23. Appendix E, Adjacent Properties Tables, Remote Properties:
 - a.) The skeet range fallout zone north of Area A-11 (Topsham) will be added to the table and a new page provided.
 - b.) The substation west of the Sabino Hill Rake Station will be added to the table and to ITS, and a new page provided. The Navy will verify the ownership of this equipment, which may be the utility company.
24. Appendix F, Personnel Interviews:
 - a.) The Navy concurs with this suggestion. The CERFA follow-up process will allow more time for attempting to locate former NAS personnel to interview. This suggestion will be incorporated into the ITS, and research will be performed to determine the proper follow-up action(s).
 - b.) Noted and concur.

The Navy is currently gathering information and ideas for development of the environmental ITS and follow-up process, and would like to include a discussion of them on the agenda for the next NAS Brunswick Technical Team Meeting scheduled for June 12-14,

2007. We would be especially interested in seeing any examples you may have from working with other teams and sites.

Please contact me at (215) 897-4915 or dawn.kincaid@navy.mil if you have any questions or comments.

Sincerely,

A handwritten signature in black ink that reads "Dawn C. Kincaid". The signature is written in a cursive, flowing style.

Dawn C. Kincaid, P.E., R.E.M.
BRAC Environmental Coordinator
By direction of BRAC PMO

Copy to:

BRAC PMO Distribution

Brunswick LRA - Carol Warren, Steve Levesque

Topsham LRA - Rich Roedner

NAS Brunswick - CAPT George Womack, Lisa Joy, Dale Mosher, Tom Brubaker

RAB Co-Chair - Tom Fusco

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